UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

In re:) In Proceedings Under Chapter 7
BRIAN JOSEPH RAINES,) Case No. 22-40822-659
Debtor.)

MOTION TO REOPEN CHAPTER 7 BANKRUPTCY CASE

COME NOW Debtor Brian Joseph Raines ("Debtor"), by and through undersigned counsel, and for his Motion to Reopen Chapter 7 Bankruptcy Case state to the Court as follows:

- 1. Debtor filed his Chapter 7 bankruptcy case on March 25, 2022.
- 2. On June 28, 2022, this Court entered its Final Decree and Notice of Chapter 7 Case Closed without Discharge due to Debtor's failure to file a certification of completion of personal financial management course.
- 3. Cause exists to reopen the Debtors case for purpose of certifying completion of the Debtors post-petition education and entering a discharge order in favor of Debtor.

WHEREFORE, Debtors pray this Court make and enter its Order granting their request to reopen the bankruptcy case, entering an order of discharge and for such other and further orders as the court deems just and proper.

Respectfully submitted,

By: /s/ Robert E. Eggmann

Robert E. Eggmann, Missouri Bar #37374 CARMODY MACDONALD P.C. 120 S. Central Avenue, Suite 1800 St. Louis, Missouri 63105 314.854.8600 (Telephone) 314.854.8660 (Fax) ree@carmodymacdonald.com (Electronic Mail)

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on June 28, 2022, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

/s/ Robert E. Eggmann